

**Annual Customer Proprietary Network Information Certification**  
**Pursuant to 47 C.F.R. § 64.2009(e)**  
**EB Docket No. 06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

Date Filed: March 1, 2018

Name of Company: Singapore Telecom USA Inc.

Form 499 Filer ID: 821224

Name of Signatory: Frank Paul Frulio

Title of Signatory: Regional Head

I, Frank Paul Frulio, certify that I am an officer of Singapore Telecom USA Inc. ("Singapore Telecom"), and acting as an agent of Singapore Telecom, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how Singapore Telecom's procedures ensure the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in sections 64.2001 *et seq.* of the Commission's rules.

Singapore Telecom has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year.

Singapore Telecom has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Singapore Telecom represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. Singapore Telecom also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Frank Paul Frulio  
Regional Head  
Singapore Telecom USA, Inc.

Date: Feb 27, 2018

**Customer Proprietary Network Information Certification**  
**Attachment A**

Singapore Telecom USA, Inc. ("Singapore Telecom") has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules pertaining to the use, disclosure and access to customer proprietary network information ("CPNI") set forth in Section 64.2001 et seq. Singapore Telecom has trained its personnel in the appropriate use of CPNI. Singapore Telecom's Code of Conduct handbook summarizes the appropriate use of CPNI and has a disciplinary process in place for failure to use CPNI in accordance with Singapore Telecom's policy.

In accordance with Singapore Telecom's policy, Singapore Telecom does not use CPNI for any marketing purpose other than to market services to customers within the same category of service to which they already subscribe. For example, Singapore Telecom may contact the customer regarding extending the length of the customer's contract with Singapore Telecom. Singapore Telecom may also use CPNI as required to render services and to bill for such services. Singapore Telecom does not share CPNI with affiliates or third parties.